# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

FRANK THOMAS, an individual	)	
Plaintiff,	)	
,	)	Case No. 14-cv-1937
v.	)	
	)	Honorable Matthew F. Kennelly
REEBOK INTERNATIONAL LTD.,	)	
a Massachusetts corporation,	)	Magistrate Judge Cole
	)	
Defendant.	)	

## **NOTICE OF MOTION**

PLEASE TAKE NOTICE THAT, on Thursday, July 31, 2014 at 9:30 a.m., or as soon thereafter as counsel may be heard, counsel for Plaintiff Frank Thomas and Defendant Reebok International Ltd., will appear before the Honorable Matthew F. Kennelly in the courtroom usually occupied by him, Room 2103 of the Dirksen Federal Building, and shall then and there present the Agreed Motion for Entry of Stipulated Protective Order, which was filed on July 23, 2014.

Dated: July 23, 2014 Respectfully submitted,

### Plaintiff, Frank Thomas

s/ Ralph C. Loeb

Ralph C. Loeb (Pro Hac Vice) Jeremy D. Smith (Pro Hac Vice) KRANE & SMITH, APC 16255 Ventura Boulevard, Suite 600 Encino, California 91436-2302 (818) 382-4000 (818) 382-4001 – facsimile

Steven J. Thompson Alexandros Stamatoglou UNGARETTI & HARRIS LLP 3500 Three First National Plaza Chicago, Illinois 60602 (312) 977-4400 (312) 977-4405 – facsimile

#### Defendant, Reebok International Ltd.

s/ James T. Hultquist

James T. Hultquist, Esq. Joshua W. Newman, Esq. REED SMITH LLP 10 South Wacker Drive Chicago, IL 60606-7507 (312) 207-1000 (312) 207-6400 - facsimile

### **CERTIFICATE OF SERVICE**

I, Joshua W. Newman, certify that on July 23, 2014, I caused the foregoing to be served upon the following persons through the District Court's ECF/CM electronic filing system:

Steven J. Thompson (IL Bar No. 61 96230/Federal Trial Bar Member) Alexandros Stamatoglou (IL Bar No. 6308169) UNGARETTI & HARRIS, LLP 3500 Three First National Plaza Chicago, Illinois 60602 (312) 977-4400 (312) 977-4405 - facsimile

Ralph C. Loeb (Pro Hac Vice) Jeremy D. Smith (Pro Hac Vice) KRANE & SMITH, APC 16255 Ventura Boulevard, Suite 600 Encino, California 9 1436-2302 (818) 382-4000 (818) 382-4001 -- facsimile

s/ Joshua W. Newman

James T. Hultquist, Esq. Joshua W. Newman, Esq. REED SMITH LLP 10 South Wacker Drive Chicago, IL 60606-7507 (312) 207-1000 (312) 207-6400 - facsimile